

Mr. James Saric, Remedial Project Manager USEPA Region 5 77 West Jackson Boulevard (SR-6J) Chicago, IL 60604-3507

Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigations/Feasibility Studies Monthly Progress Report Area 1 – Morrow Dam to Plainwell Dam (February 2008)

Dear Jim:

Attached is the twelfth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigation/ Feasibility Study (SRI/FS) – Area 1. This progress report is submitted as per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864), as well as Section 7.1 of the associated Statement of Work (SOW). If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Michael J. Erickson, P.E. Associate Vice President

Attachments

Copies:

Michael Berkoff, USEPA
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Michael Ribordy, USEPA
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INDUSTRIAL

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March 17, 2008

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B0064539.00014 #2

MONTHLY PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/ KALAMAZOO RIVER SUPERFUND SITE SRI/FS AREA 1 (MORROW DAM TO PLAINWELL DAM)

REPORT #12, FEBRUARY 2008

PREPARED BY ARCADIS MARCH 17, 2008

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)

SUBMITTED TO

JAMES SARIC, REMEDIAL PROJECT MANAGER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA)

Monthly Progress Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site SRI/FS – Area 1

REPORT #12, FEBRUARY 2008

Significant Developments and Activities during the Period, Including Actions Undertaken Pursuant to the AOC and SOW

- On February 1, ARCADIS forwarded to the USEPA the Addendum 2 to the Multi-Area Health and Safety Plan.
- On February 1, ARCADIS received the MDEQ's comments on the draft risk assessment framework, which was submitted to USEPA on October 5, 2007. The letter was dated January 25. This framework is discussed in Section 1.2.1.5 of the SOW.
- On February 13, the KRSG and USEPA participated in a conference call to discuss the Multi-Area Feasibility Study Documents (see Section 1.2.2 of the SOW).
- On February 15, ARCADIS submitted to USEPA the Semi-Annual Progress Report for the period from August 2007 through January 2008. This submittal is discussed in Section 7.2 of the SOW.
- On February 15, the KRSG notified the USEPA of its desire to meet and discuss the USEPA's comments and disapproval of the risk assessment framework.
- On February 18, ARCADIS submitted to USEPA the Annual Area Work Report for Areas 2 through 7, as discussed in Section 1.1.1 of the SOW.
- On February 19, the USEPA forwarded to the KRSG its comments on the draft Conceptual Site Model, which was submitted to USEPA on June 21, 2007. This report is discussed in Section 1.2.1.4 of the SOW.
- On February 20, James Chapman of the USEPA provided to the KRSG his thoughts on the prospective peer reviewer lists.
- On February 22, ARCADIS submitted to USEPA the Preliminary Remedial Technology Screening (Section 1.2.2.1 of the SOW), the Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (Section 1.2.2.2. of the SOW), the Preliminary Permitting/Equivalency Requirements (Section 1.2.2.3 of the SOW), and the Candidate Technologies and Testing Needs Technical Memorandum (Section 4.1 of the SOW).
- On February 26, the USEPA requested modifications to the proposed Plainwell No. 2 Dam area soil sampling locations.
- The KRSG awaits acceptance of the Data Management Plan (see Section 1.3 of the SOW), which was submitted to USEPA on June 8, 2007.

Monthly Progress Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site SRI/FS – Area 1

REPORT #12, FEBRUARY 2008

- The KRSG awaits USEPA's response to the letter requesting USEPA's data usability determination for existing data for purposes of the SRI/FS, which was submitted to USEPA on August 27, 2007.
- The KRSG awaits USEPA's comments on the proposed soil sampling plan regarding the Plainwell Dam No. 2 area, which was submitted to USEPA on January 22.
- The KRSG awaits USEPA's comments on the Multi Area Feasibility Study documents (Section 1.2.2 of the SOW) and the Candidate Technologies and Testing Needs Technical Memorandum (Section 4.1 of the SOW), which were submitted to USEPA on February 22.

Data Collected and Field Activities Conducted During the Period

No data were collected and no field activities were conducted in February.

Laboratory Data Received During the Period

- On February 1, ARCADIS received the analytical data for the top-of-bank soil cores collected along
 the mill race and the Kalamazoo River between the Plainwell No. 2 Dam and the confluence of the
 mill race and the river (sample delivery groups [SDGs] SRI005 and SRI006). Table A presents a
 summary of the segments forwarded to TestAmerica Laboratories, Inc. (TestAmerica) for analysis.
 These cores were collected in October and November 2007 as per Section 3.4.2.2 of the Area 1
 SRI/FS Work Plan.
- On February 13 and 15, ARCADIS received the analytical data for the post-removal surface sediment samples from the 2007 Plainwell time critical removal action (TCRA) removal areas (SDGs SRI007 and SRI008). Table B presents a summary of the samples collected. This work is discussed in Section 3.4.5 of the Area 1 SRI/FS Work Plan.
- Validated data for the SDGs received in December are included in this monthly report. These data
 include the surface water samples collected between November 9 and December 13 (SDGs
 TCRA15, TCRA16, TCRA19, and TCRA21 through TCRA24) (Table D). Attachment A contains the
 validation reports for these packages. The enclosed CD also contains the EDDs for these data.

Problems

None.

Actions Taken to Correct Problems

None.

Monthly Progress Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site SRI/FS – Area 1

REPORT #12, FEBRUARY 2008

Developments Anticipated During the Next Two Reporting Periods

- In March, the USEPA is scheduled to submit comments to the KRSG on the Data Management Plan (see Section 1.3 of the SOW).
- In March, the KRSG will continue to work on the Baseline Ecological Risk Assessment Report Peer Review Process (see Section 1.2.1.3 of the SOW).
- In March, the KRSG and USEPA will hold a meeting to discuss the risk assessment framework.
- In March, ARCADIS will receive the MDEQ's comments on the draft Conceptual Site Model. This
 report is discussed in Section 1.2.1.4 of the SOW.
- In March, ARCADIS will submit to the USEPA the post-removal surface sediment PCB sampling results for the 2007 TCRA removal areas.
- In April, ARCADIS is scheduled to submit to USEPA the validated data for the SDGs received in January. This includes the surface water samples collected between December 15 and December 19 (SDG TCRA26).
- In May, ARCADIS is scheduled to submit to USEPA the validated data for the SDGs received in February. This includes the top-of-bank soil cores (SDGs SRI005 and SRI006), and the post-removal surface sediment samples from the 2007 TCRA removal areas (SDGs SRI007 and SRI008).

<u>Table A — Top-of-Bank Sampling — Soil Cores Segmented in January 2008 - Data Received in February 2008</u>

Location ID	Sample Date	Sample ID	Depth Top (in)	Depth Bottom (in)	SDG
KRT11-TB-A	1/8/2007	K25800	0	6	SRI005
KRT11-TB-A	1/8/2007	K25801	6	12	
KRT11-TB-A	1/8/2007	K25802	12	24	
KRT11-TB-B	1/8/2007	K25803 [K25804]	0	6	
KRT11-TB-B	1/8/2007	K25805 ¹	6	12	
KRT11-TB-B	1/8/2007	K25806	12	24	
KRT12-TB-A	1/8/2007	K25807 [K25808]	0	6	
KRT12-TB-A	1/8/2007	K25809 ¹	6	12	SRI006
KRT12-TB-A	1/8/2007	K25810	12	16	SRI005
KRT12-TB-B	1/8/2007	K25811	0	6	
KRT12-TB-B	1/8/2007	K25812	6	12	
KRT12-TB-B	1/8/2007	K25813	12	16	
KRT13-TB-B	1/8/2007	K25814	0	6	
KRT13-TB-B	1/8/2007	K25815	6	12	
KRT14-TB-A	1/8/2007	K25816	0	6	
KRT14-TB-A	1/8/2007	K25817	6	12	
KRT14-TB-A	1/8/2007	K25818	12	24	
KRT14-TB-A	1/8/2007	K25819	24	29	SRI006
KRT14-TB-B	1/8/2007	K25820	0	6	
KRT14-TB-B	1/8/2007	K25821	6	12	
KRT14-TB-B	1/8/2007	K25822	12	17	
KRT15-TB-A	1/8/2007	K25823	0	6	
KRT15-TB-A	1/8/2007	K25824	6	12	
KRT15-TB-A	1/8/2007	K25825	12	14	
KRT15-TB-B	1/8/2007	K25826	0	6	
KRT15-TB-B	1/8/2007	K25827	6	12	
KRT15-TB-B	1/8/2007	K25828	12	14	
KRT16-TB-A	1/8/2007	K25829	0	6	
KRT16-TB-A	1/8/2007	K25830	6	12	
KRT16-TB-A	1/8/2007	K25831	12	15	
KRT16-TB-B	1/8/2007	K25832	0	6	
KRT16-TB-B	1/8/2007	K25833	6	12	
KRT16-TB-B	1/8/2007	K25834	12	13	

Notes:

All samples analyzed by TestAmerica Laboratories, Inc. for PCBs, TOC and particle size distribution analysis.

Duplicate samples are in brackets.

¹MS/MSD performed on this sample.

<u>Table B — Post-Removal Sediment Sampling — Former Plainwell Impoundment — Samples Collected in January 2008 — Data Received in February 2008</u>

Location ID	Sample Date	Sample ID	Sample Description	SDG	
PCS-1-1	1/23/2008	K55482	Orange Brown Fine to Coarse Sand, Little Fine to Medium Gravel Over Dark Gray Clayey Silt, Slight Odor	SRI008	
PCS-1-2	1/23/2008	K55481	Brown Fine to Coarse Sand, Little Fine to Medium Gravel Over Dark Gray Silty Fine Sand, Trace Organics (Wood)		
PCS-1-3	1/23/2008	K55480	Brown Fine to Medium Gravel Over Dark Gray Silty Fine Sands, Loose		
PCS-2A-1	1/23/2008	K55479	Gray Brown Loose Silt, Little Fine Sand, Little Organics (Leaves, Vegetation, Twigs)		
PCS-2A-2	1/23/2008	K55478	Gray Brown Fine to Medium Sand, Little Coarse Sand, Trace Fine Gravel, Trace Organics (Wood), Loose		
PCS-2A-3	1/23/2008	K55477	Gray Brown Fine to Medium Sand, Little Coarse Sand, Trace Fine Gravel, Trace Shells, Loose		
PCS-3B-1	1/23/2008	K55483	Gray Brown Fine to Medium Sand, Little Coarse Sand, Trace Fine to Medium Gravel, Trace Organics (Twigs), Over Gray Brown Sandy Clay		
PCS-3B-2	1/23/2008	K55484	Gray Brown Fine to Coarse Sand, Little/Some Fine to Coarse Gravel, Trace Silt, Loose		
PCS-3B-3	1/23/2008	K55485	Gray Brown Fine to Medium Sand, Little Coarse Sand, Little Fine to Coarse Gravel, Trace Silt		
PCS-4B-1	1/23/2008	K55486	Gray Brown Fine to Coarse Gravel and Fine to Coarse Sand, Trace Silt, Trace Shells		
PCS-4B-2	1/23/2008	K55487	Gray Brown Fine to Medium Sand, Trace Coarse Sand, Loose		
PCS-4B-3	1/23/2008	K55488	Gray Brown Fine to Medium Sand, Trace Coarse Sand, Trace Shells		
PCS-5-1	1/23/2008	K55476	Brown Very Loose Silt, Trace Fine Sand, Trace Organics (Vegetation)		
PCS-5-2	1/23/2008	K55475	Brown Very Loose Silt, Trace Fine Sand, Trace Organics (Vegetation)	SRI007	
PCS-5-3	1/23/2008	K55474	Dark Brown Silt, Little Fine Sand, Trace Coarse Gravel		
PCS-6A-1	1/23/2008		No Sediment - No Sample Collected		
PCS-6A-2	1/23/2008	K55489	Gray Brown Fine to Coarse Gravel, Little Fine to Coarse Sand, Trace Shells	SRI008	
PCS-6A-3	1/23/2008	K55490	Gray Brown Fine to Coarse Sand, Little/Some Fine to Coarse Gravel, Little Shells, Trace Vegetation		

See Notes on Page 2.

<u>Table B — Post-Removal Sediment Sampling — Former Plainwell Impoundment — Samples Collected in January 2008 — Data Received in February 2008</u>

Location ID	Sample Date	Sample ID	Sample Description	SDG
PCS-6B-1	1/22/2008	K55466 ¹ [K55467]	Dark Gray Brown Silty Clay, Trace Fine to Coarse Sand, Trace Fine to Medium Gravel, Slight Odor, Trace Shells	SRI008 [SRI007]
PCS-6B-2	1/22/2008	K55465	Gray Brown Fine to Medium Sand, Little Coarse Sand, Trace Fine to Medium Gravel, Trace Silt	SRI007
PCS-6B-3	1/22/2008	K55464	Dark Gray Brown Silty Fine to Coarse Sand, Trace Fine to Medium Gravel, Slight Odor	
PCS-7-1	1/22/2008		No Sediment - No Sample Collected	
PCS-7-2	1/22/2008	K55463	Gray Brown Fine to Medium Sand, Trace Coarse Sand, Trace Shells	SRI007
PCS-7-3	1/22/2008		No Sediment - No Sample Collected	
PCS-8-1	1/22/2008	K55461 ¹ [K55462]	Gray Brown Fine to Medium Sand, Trace Coarse Sand, Trace Shells	SRI007
PCS-8-2	1/22/2008	K55460	Gray Brown Fine to Medium Sand, Little Coarse Sand, Trace Shells, Trace Slag, Loose	
PCS-8-3	1/22/2008	K55459	Brown Fine to Coarse Sand and Shells, Loose	
PCS-I1-1	1/22/2008	K55470	Gray Brown Fine to Coarse Sand, Little Fine to Coarse Gravel, Trace Shells, Loose	
PCS-I1-2	1/22/2008	K55469	Gray Brown Fine to Coarse Sand, Little Fine to Medium Gravel, Little Shells, Loose	
PCS-I1-3	1/22/2008	K55468	Gray Brown Fine to Medium Sand, Trace Coarse Sand, Trace Fine to Medium Gravel, Trace Shells	
PCS-I2-1	1/22/2008	K55473	Dark Brown Leaves and Loose, Watery Silt	
PCS-I2-2	1/22/2008	K55472	Gray Brown Fine to Medium Sand, Trace Coarse Sand, Trace Fine Gravel, Trace Shells, Loose	
PCS-I2-3	1/22/2008	K55471	Gray Brown Fine to Medium Sand, Little Coarse Sand, Trace Fine to Coarse Gravel, Loose	

Notes:

All samples analyzed by TestAmerica Laboratories, Inc. for PCB analysis.

Duplicate samples are in brackets.

¹MS/MSD performed on this sample.

Sample interval is 0 to 2 inches unless otherwise noted.

<u>Table C — Results for Upstream/Downstream Surface Water — Plainwell TCRA — Data Received in December 2007</u>

Location ID:		10th Street									
Date Collected:		11/09/07	11/11/07	11/13/07	11/15/07	11/17/07	11/19/07	11/21/07	11/23/07	11/25/07	11/27/07
Sample Name:	Units	K30737	K30740	K30741	K30743	K30745	K30747	K30749	K30751	K30753	K30755
PCB Aroclors											
Aroclor-1016	ug/L	0.047 U	0.048 U	0.047 U	0.051 U	0.051 U	0.048 UJ	0.048 U	0.047 U	0.047 U	0.060 U
Aroclor-1221	ug/L	0.047 U	0.048 U	0.047 U	0.051 U	0.051 U	0.048 UJ	0.048 U	0.047 U	0.047 U	0.060 U
Aroclor-1232	ug/L	0.047 U	0.048 U	0.047 U	0.051 U	0.051 U	0.048 UJ	0.048 U	0.047 U	0.047 U	0.060 U
Aroclor-1242	ug/L	0.047 U	0.048 U	0.047 U	0.051 U	0.051 U	0.048 UJ	0.048 U	0.047 U	0.047 U	0.060 U
Aroclor-1248	ug/L	0.047 U	0.048 U	0.047 U	0.051 U	0.051 U	0.048 UJ	0.048 U	0.047 U	0.047 U	0.060 U
Aroclor-1254	ug/L	0.047 U	0.048 U	0.047 U	0.051 U	0.051 U	0.048 UJ	0.048 U	0.047 U	0.047 U	0.060 U
Aroclor-1260	ug/L	0.047 U	0.048 U	0.047 U	0.051 U	0.051 U	0.048 UJ	0.048 U	0.047 U	0.047 U	0.060 U
Total PCBs	ug/L	0.047 U	0.048 U	0.047 U	0.051 U	0.051 U	0.048 UJ	0.048 U	0.047 U	0.047 U	0.060 U
Miscellaneous	Miscellaneous										
Total Suspended Solids	mg/L	1.4	1.5	11.1	4.3	2	2.4 J	3.6	3.8	2.4	4.1

See Notes on Page 4.

<u>Table C — Results for Upstream/Downstream Surface Water — Plainwell TCRA — Data Received in December 2007</u>

Location ID:		10th Street	Farmer Street							
Date Collected:		11/29/07	12/01/07	12/03/07	12/05/07	12/07/07	12/09/07	12/11/07	12/13/07	11/09/07
Sample Name:	Units	K30757	K30760	K30761	K30763	K30765	K30767	K30769	K30771	K30738
PCB Aroclors										
Aroclor-1016	ug/L	0.050 U	0.048 U	0.051 U	0.051 U	0.054 U	0.047 U	0.047 U	0.047 U	0.048 U
Aroclor-1221	ug/L	0.050 U	0.048 U	0.051 U	0.051 U	0.054 U	0.047 U	0.047 U	0.047 U	0.048 U
Aroclor-1232	ug/L	0.050 U	0.048 U	0.051 U	0.051 U	0.054 U	0.047 U	0.047 U	0.047 U	0.048 U
Aroclor-1242	ug/L	0.050 U	0.048 U	0.051 U	0.051 U	0.054 U	0.047 U	0.047 U	0.047 U	0.048 U
Aroclor-1248	ug/L	0.050 U	0.048 U	0.051 U	0.051 U	0.054 U	0.047 U	0.047 U	0.047 U	0.048 U
Aroclor-1254	ug/L	0.050 U	0.048 U	0.051 U	0.051 U	0.054 U	0.047 U	0.047 U	0.047 U	0.048 U
Aroclor-1260	ug/L	0.050 U	0.048 U	0.051 U	0.051 U	0.054 U	0.047 U	0.047 U	0.047 U	0.048 U
Total PCBs	ug/L	0.050 U	0.048 U	0.051 U	0.051 U	0.054 U	0.047 U	0.047 U	0.047 U	0.048 U
Miscellaneous										
Total Suspended Solids	mg/L	2.5	3.5 J	4.9	2.5	2.5	2.9	2.1	2.7	0.5

See Notes on Page 4.

<u>Table C — Results for Upstream/Downstream Surface Water — Plainwell TCRA — Data Received in December 2007</u>

Location ID:		Farmer Street									
Date Collected:		11/11/07	11/13/07	11/15/07	11/17/07	11/19/07	11/21/07	11/23/07	11/25/07		
Sample Name:	Units	K30739	K30742	K30744	K30746	K30748	K30750	K30752	K30754		
PCB Aroclors											
Aroclor-1016	ug/L	0.053 U	0.054 U	0.048 U	0.051 U	0.048 UJ	0.048 U	0.074 U	0.047 U		
Aroclor-1221	ug/L	0.053 U	0.054 U	0.048 U	0.051 U	0.048 UJ	0.048 U	0.074 U	0.047 U		
Aroclor-1232	ug/L	0.053 U	0.054 U	0.048 U	0.051 U	0.048 UJ	0.048 U	0.074 U	0.047 U		
Aroclor-1242	ug/L	0.053 U	0.054 U	0.048 U	0.051 U	0.048 UJ	0.048 U	0.074 U	0.047 U		
Aroclor-1248	ug/L	0.053 U	0.054 U	0.048 U	0.051 U	0.048 UJ	0.048 U	0.074 U	0.047 U		
Aroclor-1254	ug/L	0.053 U	0.054 U	0.048 U	0.051 U	0.048 UJ	0.048 U	0.074 U	0.047 U		
Aroclor-1260	ug/L	0.053 U	0.054 U	0.048 U	0.051 U	0.048 UJ	0.048 U	0.074 U	0.047 U		
Total PCBs	ug/L	0.053 U	0.054 U	0.048 U	0.051 U	0.048 UJ	0.048 U	0.074 U	0.047 U		
Miscellaneous	Miscellaneous										
Total Suspended Solids	mg/L	2.1	0.5 U	0.9	0.8	1.1 J	1.7	19.4	4		

See Notes on Page 4.

Table C — Results for Upstream/Downstream Surface Water — Plainwell TCRA — Data Received in December 2007

Location ID:		Farmer Street	Farmer Street	Farmer Street	Farmer Street	Farmer Street	Farmer Street	Farmer Street	Farmer Street	
Date Collected:		11/27/07	11/29/07	12/03/07	12/05/07	12/07/07	12/09/07	12/11/07	12/13/07	
Sample Name:	Units	K30756	K30758 [K30759]	K30762	K30764	K30766	K30768	K30770	K30772	
PCB Aroclors										
Aroclor-1016	ug/L	0.058 U	0.052 U [0.053 U]	0.066 U	0.051 U	0.047 U	0.052 U	0.047 U	0.047 U	
Aroclor-1221	ug/L	0.058 U	0.052 U [0.053 U]	0.066 U	0.051 U	0.047 U	0.052 U	0.047 U	0.047 U	
Aroclor-1232	ug/L	0.058 U	0.052 U [0.053 U]	0.066 U	0.051 U	0.047 U	0.052 U	0.047 U	0.047 U	
Aroclor-1242	ug/L	0.058 U	0.052 U [0.053 U]	0.066 U	0.051 U	0.047 U	0.052 U	0.047 U	0.047 U	
Aroclor-1248	ug/L	0.058 U	0.052 U [0.053 U]	0.066 U	0.051 U	0.047 U	0.052 U	0.047 U	0.047 U	
Aroclor-1254	ug/L	0.058 U	0.052 U [0.053 U]	0.066 U	0.051 U	0.047 U	0.052 U	0.047 U	0.047 U	
Aroclor-1260	ug/L	0.058 U	0.052 U [0.053 U]	0.066 U	0.051 U	0.047 U	0.052 U	0.047 U	0.047 U	
Total PCBs	ug/L	0.058 U	0.052 U [0.053 U]	0.066 U	0.051 U	0.047 U	0.052 U	0.047 U	0.047 U	
Miscellaneous	Miscellaneous									
Total Suspended Solids	mg/L	5.5	2.2 J [16 J]	20.5	4.6	11.4	3.3	3.5	4.1	

Notes Regarding Data Qualifiers:

- J The compound was positively identified; however, the associated numerical value is an estimated concentration only.
- U The compound was analyzed for but not detected. The associated value is the compound quantitation limit.
- UJ The compound was not detected above the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the actual limit of quantitation.